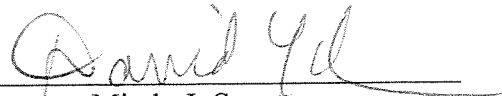


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

NATIONAL HEALTHCARE SERVICES, INC., Plaintiff, v. PENN TREATY AMERICAN CORPORATION, <i>et al.</i> , Defendants.	CIVIL ACTION NO. 02-CV-3600
--	--------------------------------

**MOTION TO AMEND
ANSWER TO ADD A COUNTERCLAIM**

Pursuant to FED. R. CIV. P. 15(a), defendants Penn Treaty American Corporation, Penn Treaty Network America Insurance Company, and Senior Financial Consultants Company (collectively "Defendants"), by their undersigned attorneys, hereby move this Court for leave to amend Defendants' answer to add a counterclaim. In support of said motion, Defendants rely upon the accompanying memorandum of law.



Mindy J. Spector
David L. Yohai
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153-0119
(212) 310-8000

-and-

Martin C. Bryce, Jr.
Douglas L. Flitter
BALLARD SPAHR ANDREWS &
INGERSOLL, LLP
1735 Market Street, 51st Floor
Philadelphia, PA 19103
(215) 665-8500

Attorneys for Defendants

Dated: January 7, 2005